

1 Matthew C. Addison (NSBN 4201)
 2 McDONALD CARANO LLP
 3 100 West Liberty Street, Tenth Floor
 Reno, Nevada 89501
 Telephone: (775) 788-2000
 4 maddison@mcdonaldcarano.com

5 *Attorneys for Central Environmental, Inc. and*
Liberty Mutual Insurance Company

7 **UNITED STATES DISTRICT COURT**
 8 **DISTRICT OF NEVADA**

10 UNITED STATES OF AMERICA FOR THE
 11 USE AND BENEFIT OF Q.M.E. GUNITE,
 INC., a California corporation,

12 Plaintiff,

13 v.

14 CENTRAL ENVIRONMENTAL, INC., an
 15 Alaska corporation; and LIBERTY MUTUAL
 INSURANCE COMPANY, a Massachusetts
 corporation,

16 Defendants.

17 Case No. 3:24-cv-00230-CSD

**STIPULATION TO DISMISS WITH
 PREJUDICE AND ORDER**

19 Plaintiff United States of America For The Use And Benefit of Q.M.E. Gunite, Inc., a
 20 California corporation (“Plaintiff”), and Defendants Central Environmental, Inc., an Alaska
 21 corporation, and Liberty Mutual Insurance Company, a Massachusetts corporation (“Defendants”),
 22 through their respective undersigned counsel, hereby represent they have entered into a confidential
 23 settlement of the above-captioned matter, and stipulate and agree as follows:

24 1. All of the claims and causes of action asserted, or that could have been asserted, by
 25 Plaintiff against Defendants, including its related persons, entities, companies (as managers,
 26 owners, shareholders, and/or members) and successors-in-interest, in this litigation may be, and
 27 hereby are, dismissed with prejudice, with each party to bear its own attorneys’ fees and costs
 28 incurred in the litigation and settlement of this matter.

1 2. All counterclaims and causes of action asserted, or that could have been asserted,
 2 by Defendants against Plaintiff, including its related persons, entities, companies (as managers,
 3 owners, shareholders, and/or members), and successors-in-interest, in this litigation may be, and
 4 hereby are, dismissed with prejudice, with each party to bear its own attorneys' fees and costs
 5 incurred in the litigation and settlement of this matter.

6 Dated this 27th day of January, 2025

Dated this 27th day of January, 2025

7 LANAK & HANNA, P.C.

McDONALD CARANO LLP

9
 10 By:/s/ *David R. Johnson*
 11 David R. Johnson (NSBN 006696)
 12 8375 W. Flamingo Rd. #102
 13 Las Vegas, NV 89147
 14 Telephone: (702) 727-3565
drjohnson@lannak-hanna.com

15
 16 *Attorneys for United States of America For*
 17 *The Use And Benefit if Q.M.E. Gunite Inc.*

By: /s/ *Matthew C. Addison*
 Matthew C. Addison (NSBN 4201)
 100 West Liberty Street, Tenth Floor
 Reno, Nevada 89501
 Telephone: (775) 788-2000
maddison@mcdonaldcarano.com

18
 19 *Attorneys for Central Environmental, Inc. and*
 20 *Liberty Mutual Insurance Company*

21 **ORDER**

22 IT IS SO ORDERED:

23
 24 
 25

 26 UNITED STATES MAGISTRATE JUDGE

27
 28 DATED: January 28, 2025